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MEMO ENDORSED

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April 27, 2020

By ECF

Honorable Valerie Caproni United States District Judge Southern District of New York 40 Foley Square New York, NY 10007 USDC SDNY
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Re: United States v. Martin Reyes, 20 Cr. 159 (VEC)

Dear Judge Caproni:

In response to the Standing Orders issued by the Honorable Colleen McMahon on April 20, 2020 (20-mc-196 and 20-mc-197) and in light of the global COVID-19 pandemic, I write with the consent of the Government to request a 60-day adjournment of the June 22, 2020 trial date and all pretrial filing deadlines.

Under the current schedule, pretrial motions are due May 8, 2020, the Government's responses are due May 22, 2020, and the Defendant's replies are due June 2, 2020. Motions *in limine* are due May 26, 2020, with responses due June 8, 2020. Proposed *voir dire* questions and jury charges are due June 1, 2020. I respectfully request that all these deadlines, along with the June 18, 2020 final pretrial conference and the June 22, 2020 trial, be adjourned by at least 60 days. The parties consent to the exclusion of time under the Speedy Trial Act through the next trial date scheduled by the Court.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Ariel Werner Ariel Werner Assistant Federal Defender 212.417.8770 ariel_werner@fd.org

cc: Juliana Murray, Assistant U.S. Attorney

Application GRANTED. Trial in this case will begin on **September 14, 2020 at 10:00 a.m**. The parties must appear for a final pretrial conference on September 10, 2020 at 2:30 p.m. Pretrial motions are due by July 10, 2020. The Government's responses are due July 24, 2020, and the Defendant's replies are due July 31, 2020. Motions *in limine* are due July 31, 2020, with responses due August 14, 2020. Proposed *voir dire* questions and jury charges are due August 3, 2020. Pursuant to 18 U.S.C. § 3161(h)(7)(A), the period of time between May 8, 2020 and September 14, 2020, is excluded under the Speedy Trial Act. The Court finds that the ends of justice outweigh the Defendant's and the public's interests in a speedy trial.

SO ORDERED.

4/27/2020

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE